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August 17, 2010

The Honorable Jocelyn Boyd  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: BellSouth Telecommunications, Inc. d/b/a AT&T Southeast d/b/a AT&T South  
Carolina v. Image Access, Inc., d/b/a NewPhone  
Docket No. 2010-19-C

Dear Ms. Boyd:

Enclosed for filing is AT&T South Carolina's Response to NewPhone's First Amended Answer/Counter-Claim in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of this pleading as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner".

Patrick W. Turner

PWT/nml  
Enclosure  
cc: All Parties of Record  
840734

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

In Re:

BellSouth Telecommunications, Incorporated	)	
d/b/a AT&T Southeast d/b/a AT&T	)	
South Carolina v. Image Access	)	DOCKET NO. 2010-19-C
Incorporated d/b/a NewPhone	)	
	)	
	)	

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**AT&T SOUTH CAROLINA’S RESPONSE TO NEWPHONE’S FIRST AMENDED  
ANSWER/COUNTER-CLAIM**

BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina (“AT&T South Carolina”) respectfully submits this Response to the First Amended Answer, Affirmative Defenses and Counter-claim of Image Access, Inc. d/b/a/ NewPhone (“NewPhone”) filed on August 3, 2010.

1. AT&T South Carolina denies the allegations in Paragraph 2 of the Counter-Claim, as amended.
2. In all other respects, AT&T South Carolina reasserts and reiterates the Response to NewPhone’s Answer/Counterclaim it filed in this Docket on or about April 9, 2010.

Respectfully submitted this 17<sup>th</sup> day of August, 2010.

BELLSOUTH TELECOMMUNICATIONS, INC.  
d/b/a AT&T SOUTHEAST d/b/a AT&T SOUTH  
CAROLINA



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STATE OF SOUTH CAROLINA                    )  
  )  
COUNTY OF RICHLAND                        )        **CERTIFICATE OF SERVICE**

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. d/b/a AT&T Southeast d/b/a AT&T South Carolina ("AT&T") and that she has caused AT&T South Carolina's Response to NewPhone's First Amended Answer/Counterclaim in Docket No. 2010-19-C to be served upon the following on August 17, 2010:

John J. Pringle, Jr., Esquire  
Ellis Lawhorne  
1501 Main Street  
5<sup>th</sup> Floor  
Columbia, South Carolina 29202  
(Image Access, Incorporated d/b/a New Phone)  
**(Electronic Mail)**

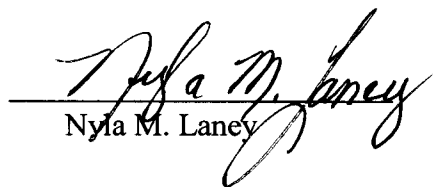
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Nyla M. Laney

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